

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN THE MATTER OF THE APPLICATION
OF THE UNITED STATES OF AMERICA
FOR A SEARCH WARRANT FOR A
FORD TAURUS SE STATION WAGON
VIN 1FAFP58S4YA120792
MARYLAND REGISTRATION 2EYG16

: *Mag*
: Misc. Case No.: *11-91M*
: ~~Under Seal~~
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AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

James Christie, Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), Washington Field Office ("WFO"), Washington, D.C., (hereinafter "your affiant") being duly sworn, deposes and states as follows:

GENERAL BACKGROUND

1. I am an "investigative or law enforcement officer of the United States" within the meaning of Section 2510 (7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to investigate and to make arrests for offenses enumerated in Section 2516 of Title 18 and 21, United States Code.

2. I am a duly appointed Special Agent of the Federal Bureau of Investigation (FBI) and have been employed as such since August 1999. I am currently assigned to the Violent Crime/Major Offenders Squad in Washington, D.C. My duties include investigating bank robberies, armored car robberies, extraterritorial offenses, kidnappings, and theft of government property. Prior to being appointed to the FBI, I served as a Philadelphia Police Officer for one year and as a Pennsylvania State Police Trooper for three years as a patrol Trooper and a criminal investigator. During the course of my participation in the investigations of violent crimes, I have testified in Grand Jury proceedings and at probable cause and detention hearings. Through my

employment with the FBI, I have gained knowledge in the use of various investigative techniques including the utilization of physical surveillance, undercover agents, confidential informants and cooperating witnesses, consensually monitored recordings, investigative interviews, trash covers, financial investigations, the service of Administrative and Grand Jury Subpoenas, analyzing telephone pen register and caller identification system data, conducting court-authorized electronic surveillance and the execution of search and arrest warrants. Through instruction and participation in investigations, I have become familiar with the manner in which criminal offenders conduct their illegal business and the methods, language, and terms that are used to disguise conversations about their activities.

3. Based on my experience and training, I am aware that:

a. Those involved in criminal activities commonly maintain at their residences, and on their property, tools and other implements they used during or in furtherance of the commission of crime.

b. Those involved in criminal activities commonly maintain at their residences, and on their property, books, records, receipts, computer diskettes, computers, notes, ledgers, airline tickets, money orders, and other papers and electronic records relating to their criminal activities.

c. Those involved in criminal activities commonly maintain books, papers, documents, and electronic records in secure locations within their residences and their property, so they can have ready access to such information.

d. Those involved in criminal activities attempt to legitimize the proceeds from their criminal activities. They often accomplish this by using the services

of foreign and domestic banks and various financial institutions, and real estate brokers. Books and papers relating to such efforts, including but not limited to, cashier checks, money orders, telegrams, letters of credit and ledgers, are maintained in the residences and on the property of those involved in criminal activities.

e. Those involved in criminal activities take, or cause to be taken, photographs of themselves, their associates, property derived from their criminal activities, and their products, including with cellular telephones, and that such photographs are often kept in their residences or stored in electronic format on computers and computer thumb drives.

f. Those involved in criminal activities very often place assets, including real and personal property, such as vehicles, in names other than their own to avoid the detection and forfeiture of such assets by government agencies and continue to use these assets and to exercise dominion and control over them even though the assets are normally owned by them.

g. Those involved in criminal activities usually have in their possession weapons. These weapons often consist of knives, guns, rifles, pistols, revolvers, shotguns, assault-type weapons, and other firearms as well as ammunition for any handgun, shotgun, and/or rifles. They possess these items for protection against robbery and also for use during and in furtherance of the commission of criminal offenses.

4. This affidavit is based, in part, upon information provided to me by other Special Agents of the FBI and officers of the Washington, D.C. Metropolitan Police Department (MPD), witnesses, physical surveillance, and other information gathered

during the course of this investigation. Since this affidavit is being submitted for the limited purpose of obtaining a search warrant for one vehicle, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to establish probable cause for the issuance of this search warrant.

5. As a result of my personal participation in this investigation, as well as through interviews with and analysis of reports submitted by other Special Agents of the FBI and officers of the MPD and other law enforcement agencies who are involved in this investigation, I am familiar with all aspects of this investigation. On the basis of this familiarity, and on the basis of other information which I have reviewed and determined to be reliable, I allege the facts to show there is probable cause to believe that fruits and evidence of offenses involving violations of: (i) interference with interstate commerce by threats or violence, in violation of Title 18, United States Code, § 1951(a); and (2) bank robbery, in violation of Title 18, United States Code, § 2113(a) and (d), will be found within the vehicle of NATHANIEL BAILEY, a green Ford Taurus SE Station Wagon, bearing Maryland registration plate 2EYG16, vehicle identification number 1FAFP58S4YA120792, located at a secure FBI facility in Washington, D.C.

6. Attachment A describes the vehicle to be searched. Attachment B describes the matters and things to be seized within the vehicle. All statements made in Attachments A and B are adopted into the body of this Affidavit as if fully set forth herein.

THE INVESTIGATION

7. This investigation was initiated by the FBI in January of 2011, based upon information received from a Cooperating Witness (hereinafter referred to as "CW-1"), who has provided truthful information on previous occasions and has never provided any false information. CW-1 provided information about an individual identified as Ricardo Hunter, who claims to have committed multiple armored car robberies recently in the Washington, D.C. metropolitan area. CW-1 independently told Hunter that CW-1 knew someone in Washington, D.C. that could help Hunter on his next armored car robbery. CW-1 then reported Hunter's interest in this proposition to the FBI.

8. On February 7, 2011, CW-1 made a recorded telephone call to Hunter. Hunter told CW-1 that he had been waiting to hear from CW-1. CW-1 told Hunter that "the dude" (the Undercover Employee ("UCE")) was "ready to move" (i.e. plan the armored car robbery) and asked Hunter whether he wanted to call the UCE or have the UCE call Hunter. Hunter stated that it did not matter and offered to meet the UCE that very afternoon to discuss the matter. CW-1 stated that the UCE's name was "Rahim" and the UCE would call Hunter and Hunter indicated that he would be waiting for the call.

9. Later on February 7, 2011, the UCE made a recorded call to Hunter and asked if Hunter was committed to going through with the armored car robbery and Hunter stated that he was ready and committed but did not want to discuss the matter over the phone. Hunter stated that he wanted to meet the UCE in person.

10. On February 9, 2011, the UCE and Hunter agreed to meet at the McDonald's restaurant located at 75 New York Ave., N.E., Washington, D.C. The FBI

recorded this meeting in both audio and video form. At the time of the meeting, Hunter was wearing a beige or tan colored winter jacket with a fur collar, a black wool hat, black gloves, black jeans and dark boots. During the meeting, the UCE told Hunter that he was an employee of Brinks Armored Car Services. The UCE and Hunter discussed Hunter robbing, with the UCE's "inside" assistance, the Brinks armored car that the UCE used during his route. Hunter informed the UCE that he had committed two previous armored car robberies with two other individuals and that these individuals would be available to commit another armored car robbery on Saturday, February 12, 2011. Hunter informed the UCE that the two individuals that would assist him with the armored car robbery would stay at Hunter's residence on Friday night, February 11, 2011 in order to make sure they were ready. Hunter also indicated that he had several weapons at his disposal, including a "Glocks, AKs (47s), 57s." Hunter also indicated that he was planning on getting a stolen vehicle to use during the armored car robbery from a "chop shop" run by an associate of his and would steal license plates to put on the vehicle. Hunter also indicated that he always wore latex gloves during the armored car robberies but that he would also bring masks to conceal his face and those of the individuals working with him. Hunter asked the UCE if they would need to put the driver of the armored car "to sleep" (i.e. kill the driver) during the robbery. During this meeting, Hunter informed the UCE that he no longer had a cellular telephone because he threw it in a river after the last armored car robbery he committed. The UCE gave Hunter the target telephone and told Hunter that he would contact Hunter on the target telephone on Saturday morning, an hour before the armored car robbery would take place, to provide the location. Hunter informed the UCE that he would "put it up" (i.e. the money

they steal during the armored car robbery) in his basement of his residence and wait for the UCE to contact him.

11. A check of public source databases revealed that Ricardo Hunter was associated with living at a residence located at 368 Burbank Street, S.E. Washington, D.C. 20019. Additionally, the landline phone number that Hunter provided to CW-1 and the UCE and that CW-1 and the UCE contacted him on during the morning and the evening is registered to the location of 368 Burbank Street, S.E. Washington, D.C. 20019. Also, through the analysis of cell site and Global Positioning System ("GPS") information, the FBI learned that Hunter was in the location of 368 Burbank Street, SE, Washington, D.C. 20019 for long periods of time in the early morning hours on February 11, 2011, thereby supporting the reasonable conclusion that Hunter resides at that location.

12. On the morning of February 12, 2011, the UCE made a recorded call to Hunter and told him that the Brinks armored car that he would be in would be passing a Shell gas station located on New York Ave., NE Washington D.C. at approximately 10 a.m. that morning. At approximately 9:15 a.m., Hunter and another black male left 368 Burbank Street, SE Washington, D.C. and entered a green Ford Taurus SE Station Wagon with Maryland registration 2EYG16. Hunter and the black male drove to a location in Southeast Washington, D.C. and picked up a third black male. All three individuals then traveled to the Shell gas station on New York Ave., NE Washington, D.C., pursuant to the pre-arranged plan. At approximately 10:05 a.m., the Brinks armored car, containing \$2,000 of FDIC insured U.S. currency, passed the Shell gas station and the green Ford Taurus SE Station Wagon pulled out of the gas station and

followed the Brinks armored car. The green Ford Taurus SE Station Wagon continued to follow the Brinks armored car as it turned north on Bladensburg Road, NE and then east on V Street, NE. When the Brinks armored car turned left on 31st Street, NE, the green Ford Taurus SE Station Wagon pulled over on V Street, NE and Hunter and one of the black males, later identified as Daniel Webster Chapman, exited the vehicle and walked north on 31st Street, NE towards the stopped Brinks armored car. Hunter and Chapman were then stopped by law enforcement on 31st Street, NE. FBI Swat team members observed that Chapman was carrying a silver revolver in his hand, which he dropped when ordered by law enforcement and taken into custody. Hunter was stopped and arrested and a search incident to his arrest revealed he had a black handgun in his jacket pocket. The third black male, later identified as Nathaniel Bailey, who had remained in the driver's seat of the green Ford Taurus SE Station Wagon, was ordered out of the vehicle and taken into custody. Once Bailey was removed from the vehicle, FBI Swat team members observed, in plain view, a black assault rifle on the driver's side floorboard of the green Ford Taurus SE Station Wagon.

13. A check of the Department of Motor Vehicle Records revealed that the green Ford Taurus SE Station Wagon, bearing Maryland registration plate 2EYG16, VIN 1FAFP58S4YA120792 was registered to NATHANIEL BAILEY at 6302 G Street, Capitol Heights, Maryland.

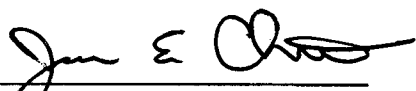
CONCLUSION

14. Based upon these facts, there is probable cause to believe that there are fruits and evidence, as further described in Attachment B, of: (i) interference with

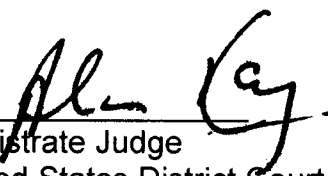
interstate commerce by threats or violence, in violation of Title 18, United States Code, § 1951(a); and (2) bank robbery, in violation of Title 18, United States Code, § 2113(a) and (d), will be found in the vehicle of NATHANIEL BAILEY, a green Ford Taurus SE Station Wagon, bearing Maryland registration plate 2EYG16 and VIN 1FAFP58S4YA120792, as further described in Attachment A.

15. Wherefore, pursuant to Rule 41 of the Federal Rules of Criminal Procedure, I respectfully request a warrant to search the vehicle of NATHANIEL BAILEY, a green Ford Taurus SE Station Wagon, bearing Maryland registration plate 2EYG16 and VIN 1FAFP58S4YA120792. The vehicle will be moved to a secure FBI facility and searched by appropriately trained members of the FBI's Evidence Response Team in order to collect any physical and trace evidence that falls within the list of items to be seized set forth herein.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.


Special Agent James Christie
Federal Bureau of Investigation

Sworn and subscribed to before me this 12th day of February, 2011.


Magistrate Judge
United States District Court
for the District of Columbia
ALAN KAY
U.S. MAGISTRATE JUDGE

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Attachment A

The vehicle to be searched is secured within a secure FBI facility in Washington, D.C. The vehicle is a green Ford Taurus SE Station Wagon, bearing Maryland registration plate 2EYG16, vehicle identification number 1FAFP58S4YA120792. The vehicle's registered owner is NATHANIEL BAILEY of 6302 G Street, Capitol Heights, Maryland.

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Attachment B

- Articles of clothing matching witness descriptions provided above
- Latex gloves
- Proceeds, including United States currency, precious metals, jewelry, and other financial instruments;
- Money wrappers, straps, bands
- Deposit slips
- ATM envelopes or other bank related forms
- Evidence of recent purchases including receipts and invoices
- Firearms or other weapons
- Photographs depicting associations between the suspects
- Evidence of use of storage facilities or bank safe deposit boxes
- Calendars, diaries, or other documents used to record schedules, meetings, conversations, or other events related to plans for this robbery
- Documents or records or evidence reflecting the acquisition of the vehicle used in the robbery or the location of the "chop shop" operation from which it was acquired
- Maps or other items displaying the location of Brinks routes
- Pictures or diagrams of Brinks vehicles
- GPS devices
- Evidence of automobile ownership
- Cellular telephones, pagers, and the contents thereof, and records and receipts reflecting their ownership and use;
- Telephone records, including toll records, receipts, bill's service data, telex activity, facsimile activity, and other related records;
- Photographs, including still photos, negatives, video tapes, films, undeveloped film and the contents therein, in particular photographs of co-conspirators, assets, U.S. currency, and offense locations;
- Address and/or telephone books, reflecting names, addresses, telephone numbers, pager numbers, fax numbers and/or telex numbers, including computerized or electronic address and telephone records;
- Guns, rifles, pistols, revolvers, shotguns, assault-type weapons, pellet guns, and

- other firearms as well as ammunition for any firearm
- Any locked or closed containers including but not limited to safes, both combination and lock type, and their contents, which could include any of the above listed evidence.
 - Trace evidence to include hair, fiber, fingerprint and DNA.